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From: (b) (6)
Sent: Wednesday, November 09, 2011 7:01 PM
To: (b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)
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Subject: RE: (b) (7)(F) Demo Project - Open Burning Notification

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We have scheduled the open burning for the (b) (7)(F) Demo Project for Friday November 11, 2011. We had a meeting today to assess the weather forecast and all parameters were acceptable. We are planning to start the burn at approximately 4:30 pm on Friday. If there is any reason we need to postpone the burn we will let you know.

If DEQ "declares an alert, warning, or emergency stage of an air pollution episode "such that "all open burning shall immediately be terminated." please call the environmental emergency phone 540-230-8970.

Thank You
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(b) (6)(b) (6)(b) (6)(b) (6)
Environmental Affairs Department
Alliant Techsystems Inc.
P.O. Box 1
Radford, VA 24143
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"Together Everyone Accomplishes More." (TEAM)

From: (b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)
Sent: Thursday, June 03, 2010 10:05 AM
To: (b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)
Cc: (b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)
Subject: RE: (b) (7)(F) Demo Project

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The DEQ Air and Waste staff has discussed your proposal for open burning materials from the demolition project. We agree with your proposal, provided that only those materials identified in section 5c are burned.
As a condition to this approval, you must notify this office of the days when open burning will be conducted. This notification must be submitted 24 hours prior to conducting the burning. In the event that the DEQ declares an alert, warning, or emergency stage of an air pollution episode, all open burning shall immediately be terminated.

Should you have any questions concerning this correspondence, please contact my office.

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Blue Ridge Regional Office
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From: (b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)
Sent: Monday, May 24, 2010 11:11 AM
To: (b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)

Cc: (b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)
Subject: RE: (b) (7)(F) Demo Project

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Thank you for your response to the site visit. We have discussed these issues with our safety department and think that we have struck a good balance to protect human health and the environment.

1. What is the total volume of material to be open burned?

There is an estimated 200 tons of wood from the building walls that will need to be burned. This wood has been exposed to many years of building nitrocellulose/nitrocotton (NC) purification. The building has been in "stand-by" status for many years with operations continuing to wash the building down due to the risk of nitrocellulose in the building. An estimated 100 tons of scrap metal requires burning to decontaminate prior to recycling off-plant as scrap metal.

2. What percentage is wood, metal and plastic?

The plastic will be removed and disposed of off-plant. The plastic will not accumulate NC such that burning will be required.

3. Describe how the facility will manage pressure treated wood and asbestos-containing materials.

Asbestos materials (such as pipe insulation, roofing and siding) have been identified by a certified asbestos inspector and are being removed by a licensed contractor. No burning of Asbestos materials will be required. Treated wood will be removed before demolition begins, cleaned, inspected, and transported off-plant for proper disposal.

4. A similar demolition project occurred in the mid-2000's: similar buildings in number, size and type. The demotion debris was open burned. How many burns did it take to process all of the demo debris from that project?

A review of our records indicate that about 140,000 pounds were accumulated on the scrap burning ground during the first calendar quarter 2001 (January - March) and 165,000 pounds were accumulated on the scrap burning ground during the second calendar quarter 2001 (April - June). Records indicate that the scrap burning ground was burned once in 2001 on June 8, 2001.

5. In the mid-2000's, the DEQ asked the facility to evaluate the waste streams being processed at the open burn pile and to employ a waste management hierarchy. The DEQ asked the facility to categorize the material as follows:

a) Wastestreams, which do not pose a real safety concern, that could be diverted to a landfill without treatment.
b) Wastestreams, which have a real safety concern, that could be diverted to more conventional waste management options such as the decon oven or pressure washing prior to conventional recycling or disposal.
c) Wastestreams, which have a real safety concern, but that are too large to be processed in the decon oven.

It is this last group (c) that the DEQ indicated consideration would be given to for open burning in the future. Describe the challenges the facility faces in categorizing and managing the demolition debris from this project per the above protocol. Sufficient detail should be provided to evaluate whether the conditions pose a real challenge for the facility.

Here is a breakdown of how the materials will be managed:

a) Wastestreams, which do not pose a real safety concern, that could be diverted to a landfill without treatment.

From this project the metal pipes that are in the building that were not in NC service like the fire water lines and metal conduit can be recycled as scrap metal after washing and inspection. Plastic conduit can be disposed of as solid waste after washing and inspection. The support buildings will be handled as nonhazardous solid waste. The building bricks and concrete will be managed as solid waste or inert debris after washing and inspection.

b) Wastestreams, which have a real safety concern, that could be diverted to more conventional waste management options such as the decon oven or pressure washing prior to conventional recycling or disposal.

The stainless steel tanks that have been in NC service can be washed and inspected inside and out. These will be prepared on-site for scrap metal recycling off-plant to minimize mishandling of the material by scrap dealers. The roof materials will be managed as solid waste after washing and inspection. The metal siding on the NC service buildings will be managed as scrap metal after washing and inspection. The treated wood decking was replaced shortly before the building was put into stand-by and has not been used in any significant NC production. Therefore, this material will be managed as solid waste after washing and inspection.

c) Wastestreams, which have a real safety concern, but that are too large to be processed in the decon oven.

This project will generate three kinds of materials that present a safety concern that requires open burning. First there are carbon steel tanks and piping (mostly wastewater piping) that have been in NC service that have a rust layer in contact with NC. Our experience indicates that NC is incorporated into this rust layer as it is formed and cannot be removed by washing. The joints of pipe that are less than 9' feet long will be sent to the decon oven. The tanks and longer piping sections will require open burning. Second there are stainless steel items that have been in NC service such as long joints of pipe that are too big to go in the decon oven and cannot be adequately cleaned and inspected to be sold as scrap metal without heat decontamination. Third there is wood that has been in NC service that has sufficient cracks and NC exposure that the Safety Department requires heat decontamination before removal from the facility. In general, this will be limited to the interior wood walls and structural support for the NC service buildings. The hollow wall construction and years of operation has allowed NC to build up in the space between the metal siding and the interior wooden walls. These buildings have been kept wet by weekly wet downs during the standby period. The wood will be keep wet during demolition and removal but has sufficient cracks and NC exposure that the Safety Department requires heat decontamination before removal from the facility.

Thank You

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Environmental Affairs Department
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Radford, VA 24143
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"Together Everyone Accomplishes More." (TEAM)

From: (b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)
Sent: Friday, February 12, 2010 5:50 PM
To: (b) (6)(b) (6)(b) (6)(b) (6)

Cc: (b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)
Subject: (b) (7)(F) Demo Project

(b) (6)(b) (6)

I would like to thank you for the opportunity to meet with ATK staff to discuss the demolition project and the debris management that is proposed. As we discussed at the close of the site visit, I am forwarding the below request for information. Once we have your responses, DEQ's Waste and Air Programs will discuss the proposal to open burn materials from the demolition project.

1. What is the total volume of material to be open burned?
2. What percentage is wood, metal and plastic?
3. Describe how the facility will manage pressure treated wood and asbestos-containing materials.
4. A similar demolition project occurred in the mid-2000's: similar buildings in number, size and type. The demotion debris was open burned. How many burns did it take to process all of the demo debris from that project?
5. In the mid-2000's, the DEQ asked the facility to evaluate the wastestreams being processed at the open burn pile and to employ a waste management hierarchy. The DEQ asked the facility to categorize the material as follows:
    a) Wastestreams, which do not pose a real safety concern, that could be diverted to a landfill without treatment.
    b) Wastestreams, which have a real safety concern, that could be diverted to more conventional waste management options such as the decon oven or pressure washing prior to conventional recycling or disposal.
    c) Wastestreams, which have a real safety concern, but that are too large to be processed in the decon oven.

    It is this last group (c) that the DEQ indicated consideration would be given to for open burning in the future. Describe the challenges the facility faces in categorizing and managing the demolition debris from this project per the above protocol. Sufficient detail should be provided to evaluate whether the conditions pose a real challenge for the facility.

If you have any questions, please feel free to contact me.
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Virginia Department of Environmental Quality
Blue Ridge Regional Office
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